From: Dan Peacock

To: Kable Davis; Jennifer Gaines; Bill Jacobs

Cc: Meredith Laws Subject: Fw: Reckitt Benckise Date: 01/11/2010 12:10 PM

Attachments:

Status of Claims -0A-OT-OI-OO- hrb comments 12-31-09.doc Final Stamped Registration Notice 3282-93 9-23-09.pdf Final Stamped Registration Notice 3282-92 9-23-09.pdf Status of Claims -0A-OT-OI-OO-RBmarketing comments

AII,

Below is the company's response (4 attachments) to our initial comments on their marketing claims. Their response will be the subject of our internal meeting on Tuesday at 8AM.

Thank You.

Daniel B. Peacock, Biologist Tel: 703-305-5407 Fax: 703-308-0029

E-Mail: peacock.dan@epa.gov

United States Postal Service (USPS): USEPA, Insecticide-Rodenticide Branch, Registration Division (7504P), 1200 Pennsylvania Ave. NW, Washington, DC 20460-0001

Courier Deliveries: USEPA, Insecticide-Rodenticide Branch, Registration Division, Room S-4900, One Potomac Yard, 2777 Crystal Drive, Arlington, VA 22202

---- Forwarded by Dan Peacock/DC/USEPA/US on 01/11/2010 12:06 PM -----

From: "Heather Bjornson" < HBjornson@TSGUSA.COM>

Dan Peacock/DC/USEPA/US@EPA Cc: John Hebert/DC/USEPA/US@EPA Date: 01/04/2010 02:36 PM Subject: RE: Reckitt Benckiser

I have attached two word files that add comments from me (identify what claims were approved previously and which RB should just take off), and the other table is Reckitt Benckiser's comments on the most important claims for them. I have also attached two recent registration notices with the stamp approved labels that have a good portion of these claims approved.

Regards, Heather R. Bjornson Technology Sciences Group, Inc. 1150 18th Street NW., Ste. 1000 Washington DC 20036 Tel:: 202-828-8945 Fax: 202-872-0745

----Original Message-------Original Message---From: Peacock.Dan@epamail.epa.gov [mailto:Peacock.Dan@epamail.epa.gov]
Sent: Monday, January 04, 2010 2:20 PM
To: Heather Bjornson
Cc: Hebert.John@epamail.epa.gov
Subject: RE: Reckitt Benckiser

Dear Ms. Bjornson,

Before setting up a meeting, I would need to know the claims about which you have a problem.

In addition, you have made certain representations about our accepting certain claims previously for such products.

I need to know which claims you are referring to and the reg numbers and the dates of letters where we previously accepted those claims so that I can review them.

As the pending products would be our first Tier III products registered, we will be very careful to insure that they are done correctly and that none of the proposed 400+ label claim combinations are false or misleading per 40 CFR 156(a)(5).

After receiving the information above and having the relevant internal discussions, I would be happy to set up a conference call.

Thank You,

Daniel B. Peacock, Biologist Tel: 703-305-5407 Fax: 703-308-0029 E-Mail: peacock.dan@epa.gov

Addresses: United States Postal Service (USPS): USEPA, Insecticide-Rodenticide Branch, Registration Division (7504P), 1200 Pennsylvania Ave. NW, Washington, DC 20460-0001

Courier Deliveries: USEPA, Insecticide-Rodenticide Branch, Registration Division, Room S-4900, One Potomac Yard, 2777 Crystal Drive, Arlington, VA 22202

From: >-----| "Heather Bjornson"

<pre><hbjornson@tsgusa.com> ></hbjornson@tsgusa.com></pre>	
Dan Peacock/DC/USEPA/US@EPA, John Hebert/DC/USEPA/US@EPA	
Date:	
 01/04/2010 11:16 AM >	
 RE: Reckitt Benckiser 	
Can we please set-up a conference call with the two of you to discuss the claims for the pending products? We will make ourselves available to your schedule.	
Regards, Heather R. Bjornson Technology Sciences Group, Inc. 1150 18th Street NW., Ste. 1000 Washington DC 20036 Tel.: 202-828-8945 Fax: 202-872-0745	
Original Message From: Peacock.Dan@epamail.epa.gov [mailto:Peacock.Dan@epamail.epa.gov] Sent: Tuesday, December 29, 2009 10:56 PM To: Heather Bjornson Subject: Re: Reckitt Benckiser	
Dear Ms. Bjornson,	
Thank you for the electronic copies of the labels of the proposed 4 products: 3282-OA, 3282-OT, 3282-OI, and 3282-OO.	
The attached 11 page table lists the 100+ marketing claims made for the four products and includes the status of each claim for each product (400+ combinations), including which claims:	
are acceptable, must be deleted, or must be modified.	
(See attached file: Status of Claims, -OA,-OT,-OI,-OO.doc)	
I am working on the first letters for the two Bromethalin products (3282-OA and 3282-OT), which will contain additional comments on the forms, data, and labeling. Those letters will most likely go out tomorrow or Monday. I will be working on the letters for the two Diphacinone products as soon as I receive the efficacy reviews. With the above table and the letters for the Bromethalin products, you will have a good sense of the remaining comments on the Diphacinone products.	
After you have had an opportunity to review the table and letters, let me know if you have any questions.	
Daniel B. Peacock, Biologist Tel: 703-305-5407 Fax: 703-308-0029 E-Mail: peacock.dan@epa.gov	
Addresses: United States Postal Service (USPS): USEPA, Insecticide-Rodenticide Branch, Registration Division (7504P), 1200 Pennsylvania Ave. NW, Washington, DC 20460-0001	
Courier Deliveries: USEPA, Insecticide-Rodenticide Branch, Registration Division, Room S-4900, One Potomac Yard, 2777 Crystal Drive, Arlington, VA 22202	
> From: >	
>	
"Heather Bjornson" <hbjornson@tsgusa.com></hbjornson@tsgusa.com>	
>	
· >	

Dan Peacock/DC/USEPA/US@EPA
12/16/2009 11:12 PM
Reckitt Benckiser
Dan - I am traveling through Friday but you will find the requested labels attached. Please e-mail me tomorrow if and what claims have to be removed and I can get them done for you.
Regards, Heather R. Bjornson Technology Sciences Group, Inc. 1150 18th Street NW., Ste. 1000 Washington DC 20036 Tel.: 202-828-8945 Fax: 202-872-0745
[attachment "Saturn IV - diphacinone 10-16-09.doc" deleted by Dan Peacock/DC/USEPA/US] [attachment "Mimas III - Bromethalin hrb.doc" deleted by Dan Peacock/DC/USEPA/US] [attachment "Saturn III - Bromethalin hrb.docx" deleted by Dan Peacock/DC/USEPA/US] [attachment "Mimas IV - diphacinone (2).doc" deleted by Dan Peacock/DC/USEPA/US]
Status of Claims -0A-0T-0I-00- hrb comments 12-31-09.doc Final Stamped Registration Notice 3282-93 9-23-09.pdf Final Stamped Registration Notice 3282-92 9-23-09.pdf Status of Claims -0A-0T-0I-00-RBmarketing comments.doc